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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

MAY - 4 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Petition of Competitive Telecommunications Association,)
et al On Defining Certain Incumbent LEC Affiliates As) CC Docket 98-39
Successors, Assigns, or Comparable Carriers Under)
Section 251(h) of the Communications Act)

MOTION TO ACCEPT FOR LATE FILING

Cindy Z. Schonhaut
Senior Vice President,
Government and External Affairs
ICG Communications, Inc.
161 Inverness Drive West
Englewood, CO 80112
(303) 414-5464

Albert H. Kramer
Michael Carowitz
DICKSTEIN SHAPIRO MORIN
& OSHINSKY
2101 L Street, N.W.
Washington, DC 20037
(202) 828-2226

Attorneys for ICG Telecom Group

May 4, 1998

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Section 251(h) of the Communications Act)

MOTION TO ACCEPT FOR LATE FILING

ICG Telecom Group ("ICG"), by its attorneys and pursuant to Section 1.46 of the Commission's Rules, hereby respectfully requests that the Commission accept for late filing its Comments in the above-captioned proceeding.

Per Public Notice DA-98-627, released April 1, 1998, Comments in the above-captioned proceeding were due for filing by May 1, 1998. ICG had prepared its Comments well in advance of the May 1, 1998 filing due date, and had dispatched a courier in ample time to meet the 5:30 p.m. Comment filing deadline. However, due to error and delay on the part of the courier in delivering the filing to the Commission, ICG's Comments inadvertently did not reach the Commission Secretary's office in time for filing. By the instant motion, ICG seeks Commission approval to file its Comments one business day late.

ICG is a leading national "facilities-based" competitive local exchange carrier ("CLEC") with extensive fiber-optic networks, and currently offers local, long distance and enhanced telephony and data services in the states of California and Colorado, the Ohio Valley, and parts of the Southeastern United States. ICG faces the incumbent local exchange carriers ("ILECs") in the local exchange marketplace on a daily basis. ICG is, at present, dependent on the rights provided for by Section 251 of the Telecommunications Act. Hence, ICG is directly affected by the competitive practices of the ILECs and the availability of ILEC facilities. Therefore, ICG has a clear interest in the above-captioned proceeding. Commission acceptance of ICG's Comments will permit ICG's position to be heard and will enable the Commission to base its decision in this proceeding on a full and complete record. Accordingly, ICG submits that the public interest would be served by Commission grant of the instant motion.

ICG will hand-serve a copy of the instant motion and its Comments on the Petitioners and other all other parties specified in the Public Notice. In addition, ICG will serve all persons who filed Comments in this proceeding with the instant motion and its Comments, and will provide a copy of the instant motion and its Comments to all persons who had requested from International Transcription Service ("ITS") either same day or next day copies of Comments filed in this proceeding. Accordingly, no interested participants in the proceeding will be prejudiced by Commission grant of the instant motion.

For all the foregoing reasons, and in the interest of creating a full and complete record, ICG Telecom Group respectfully requests that the Commission grant the instant motion.

Respectfully submitted,

Cindy Z. Schonhaut
Senior Vice President
Government and External Affairs
ICG Communications, Inc.
161 Inverness Drive West
Englewood, CO 80112
(303) 414-5464

By: Albert H. Kramer *mmf*
Albert H. Kramer
Michael Carowitz
DICKSTEIN SHAPIRO MORIN
& OSHINSKY
2101 L Street, N.W.
Washington, DC 20037
(202) 828-2226

Attorneys for ICG Telecom Group

May 4, 1998

CERTIFICATE OF SERVICE

I hereby certify that on May 4, 1998, a copy of the foregoing Motion to Accept for Late Filing of ICG Telecom Group was hand-delivered to the following:

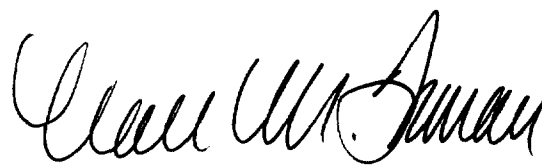
David L. Sieradzki
Hogan & Hartson L.L.P.
555 13th Street, NW
Washington, DC 20004-1109

ITS
1231 20th Street, NW
Washington, DC 20037

Counsel for:

The Competitive Telecommunications Association
The Florida Competitive Carriers Association
The Southeastern Competitive Carriers Association

Janice M. Myles
Common Carrier Bureau
Federal Communications Commission
1919 M Street, NW
Room 544
Washington, DC 20554



Valerie M. Furman